

USAO2011R00984/DCC

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Criminal No. ~~13~~

v.

KYLE POWELL

13-47 (JAP) 01
JAN 23 2013
AT 8:30 WILLIAM T. WALSH
CLERK INFORMATION
M 18 U.S.C. § 371

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

(a) Defendant KYLE POWELL was a resident of Wildwood, New Jersey, and a probate member of the white supremacist organization known as the Aryan Terror Brigade ("ATB"). Defendant KYLE POWELL espoused white supremacist views in a variety of ways including, but not limited to, the use of an internet-based, social media website.

(b) Co-conspirator Michal Gunar was a resident of Cranbury, New Jersey, and a member of ATB.

(b) Co-conspirator Christopher Ising was a resident of East Brunswick, New Jersey, and a member of the white supremacist organization known as the Atlantic City Skins ("ACS").

(c) MH, MS and RM were young males of Egyptian descent who resided at an apartment complex in Sayreville, New Jersey ("the Apartment Complex").

The Conspiracy

2. From in or about December 2011, through on or about January 3, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

KYLE POWELL

did knowingly and willfully conspire with others to commit an offense against the United States; that is, to willfully cause bodily injury to a person, specifically MH and RM, who are of Egyptian descent, because of the person's actual and perceived race, color, and national origin, contrary to 18 U.S.C. § 249(a)(1).

Manner and Means and Object of the Conspiracy

3. It was the object of the conspiracy to cause bodily injury to another person because of that individual's actual or perceived race, color, and national origin.

Overt Acts

4. In furtherance of the conspiracy, and to effect its unlawful object, defendant KYLE POWELL committed and caused to be committed the following overt acts on or about December 31, 2011, in the District of New Jersey:

(a) Defendant KYLE POWELL attended a social gathering for ATB members and affiliates at a residence in East Brunswick, New Jersey.

(b) At the ATB social gathering, defendant KYLE POWELL drank alcohol, listened to white supremacist music, and

discussed plans with his co-conspirators to locate and assault non-Caucasian individuals.

(c) During the social gathering, defendant KYLE POWELL and his co-conspirators, among others, departed the East Brunswick residence and drove to the Apartment Complex.

(d) Defendant KYLE POWELL possessed a pair of "sap gloves," which are weighted, leather gloves with steel pellets sewn into the top and knuckle portions of the gloves, as he proceeded to the Apartment Complex.

(e) Upon their arrival at the Apartment Complex, defendant KYLE POWELL and his co-conspirators searched for non-Caucasian individuals to assault, and ultimately located MH, MS and RM.

(f) Following the assault on MH and RM, defendant KYLE POWELL fled the Apartment Complex and returned to the ATB social gathering at the East Brunswick residence.

(g) On or about January 3, 2012, defendant KYLE POWELL received an ATB tattoo, or "patch," on his left arm to symbolize his acceptance as a new member of ATB.

In violation of 18 U.S.C. § 371.


PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

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INFORMATION FOR
18 U.S.C. § 371

PAUL J. FISHMAN
UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

DENNIS CARLETTA
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2767